

**UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF NEW YORK**

IRAQ TELECOM LIMITED,

Petitioner,

v.

IBL BANK S.A.L,

Respondent.

Civil Action No. 21-cv-10940 (DLC)

**DECLARATION OF KEVIN REED IN SUPPORT OF IRAQ TELECOM’S
REPLY POST-REMAND MEMORANDUM IN FURTHER SUPPORT OF ITS MOTION
TO CONFIRM ATTACHMENT AND IN OPPOSITION TO IBL’S CROSS MOTION TO
VACATE ATTACHMENT**

Kevin Reed, makes the following declaration, pursuant to 28 U.S.C. § 1746:

1. I am a member of the bar of the State of New York and am admitted to practice in the Southern District of New York. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Petitioner Iraq Telecom Limited (“Iraq Telecom”). I make this declaration in support of Iraq Telecom’s Reply Post-Remand Memorandum in Further Support of its Motion to Confirm Attachment and in Opposition to Respondent IBL Bank S.A.L.’s (“IBL”) Cross-Motion to Vacate Attachment in order to certify the attached document is a true, accurate and complete copy of the referenced document.

2. Attached as Exhibit A is a true and correct copy of Banque du Liban’s (“BdL”) “Basic Decision No. 13262 of 27 August 2020 (Exceptional Measures to Revive the

Business of Banks operating in Lebanon).” Exhibit A was retrieved from BdL’s publicly available website.¹

3. Attached as Exhibit B is a true and correct copy of IBL’s consolidated financial statements and independent auditors’ report for the year ending on December 31, 2020. Exhibit B was retrieved from the commercial register of Lebanon in Beirut.

4. Attached as Exhibit C is a true and correct copy of Bank Audi S.A.L.’s 2020 Annual Report, which includes Bank Audi S.A.L.’s consolidated financial statements and independent auditors’ report for the year ending on December 31, 2020. Exhibit C was retrieved from Bank Audi S.A.L.’s publicly available website.²

5. Attached as Exhibit D is a true and correct copy of Byblos Bank S.A.L.’s consolidated financial statements and independent auditors’ report for the year ending on December 31, 2020. Exhibit D was retrieved from Byblos Bank S.A.L.’s publicly available website.³

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 28th day of October 2022, at New York, New York.

/s/ Kevin S. Reed
Kevin Reed

¹ https://www.bdl.gov.lb/files/circulars/154_en.pdf.

² <https://www.bankaudigroup.com/group/investor-relations/annual-reports>.

³ <https://byblos.byblosbank.com/files/Library/Assets/Gallery/FinancialResult/FinancialReports/Consolidated%20Financial%20Statements/Download2020reports/Byblos%20Bank%20Audited%20Consolidated%20FS%2020%20With%20Notes.pdf>.